## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

ALFRED R. CAMARENA, as Personal Representative of the Estate of Curtis Wayne Whitley, deceased,

Plaintiff,

vs.

NATIONAL FOOTBALL LEAGUE, a corporation; and DOES 1 through 100

Defendants.

Case No.: 2:12-cv-03125-AB

## **STIPULATION**

This Stipulation and Agreement is made this 11th day of September 2012, by and among Alfred R. Camarena ("Plaintiff") and the National Football League ("Defendant").

WHEREAS, Plaintiff filed a complaint in the California Superior Court for Alameda County on March 21, 2012, stating that he would move to be appointed personal representative of the Estate of Curtis Whitley; and

WHEREAS, Plaintiff was appointed personal representative of the estate of Curtis Whitley by Letters of Administration issued by the Superior Court of California on June 22, 2012;

NOW, THEREFORE, it is hereby stipulated and agreed by and among the parties and/or their respective counsel as follows:

- 1. Defendant consents to Plaintiff filing a First Amended Complaint in this matter pursuant to Fed. R. of Civ. P. 15(a)(2) reflecting the fact that Plaintiff has been appointed personal representative of the Estate of Curtis Whitley and is the legal guardian for Curtis Whitley's minor children, Hannah Jane Whitley and Curtis Wayne Whitley Jr.
- 2. Within five business days hereof, Plaintiff shall serve a copy of his First Amended Complaint in this matter upon the undersigned counsel for Defendant via email and file the same document with the Court via overnight mail.

It is so STIPULATED AND AGREED, this 11th Day of September, 2012:

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Counsel for Defendant NFL

## IN THE UNITED DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION

No. 12-md-02323 (AB)

THIS DOCUMENT RELATES TO:

ALFRED R. CAMARENA, as Personal Representative of the Estate of Curtis Wayne Whitley, deceased,

2:12-cv-03125-AB

Plaintiff,

-against-

NATIONAL FOOTBALL LEAGUE, a corporation; and DOES 1 through 100,

Defendants.

## **CERTIFICATE OF SERVICE**

I hereby certify under penalty of law that on September 12, 2012, a copy of the foregoing Stipulation was filed electronically with the Clerk of the Court of the United States District Court for the Eastern District of Pennsylvania using the CM/ECF System, which will send notice of such filing by e-mail to all parties or by mail to anyone unable to accept electronic filing as indicted on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Randy Paradise